

Oct 15 2005

Arthur Neal  
Director, Program Administration  
Nation Organic Program  
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So., Ag Stop 0268  
Washington, DC 20250

Email: [National.List@usda.gov](mailto:National.List@usda.gov)

Dear Mr. Neal and National Organic Standards Board:

This letter is in reply to the National Organic Program, Sunset Review, Docket number TM-04-07.

Grimmway Farms, is a family owned, grower, packer and shipper of Organic Fruits and Vegetables, throughout the United States. We support the continued allowance of the following substances for organic productions.

Sincerely

Stephen Martin  
Quality Director  
Grimmway Farms

## Sunset Review

Name of Substance	Location on National List	Reason for Continued Use
Chlorine Materials Calcium hypochlorite Sodium hypochlorite	205.601(a)(2)(ii) & (iii)	Water purification to comply with potable water rules & GAPs
Mulches Plastic Covers	205.206(b)(2)(ii)	Weed Control, used as a weed barrier to reduce hand weeding
Boric Acid	205.601(e)(2)	Insect Control: used for structural pest control, no contact with Organic food or crops
Elemental sulfur	205.601(e)(4)	Insect Control: should remain on list as there are few options.
Lime sulfur	205.601(e)(5)	Insect Control: should remain on list as there are few options.
Oils horticultural	205.601(e)(6)	Insect Control: should remain on list as there are few options.
Soaps insecticidal	205.601(e)(8)	Insect Control: used with registered pesticides
Sticky traps/barriers	205.601(e)(8)	Insect and Rodent control needed because choices are limited
Vitamin D3	205.601(g)(2)	Rodent control needed because choices are limited
Coppers, fixed	205.601(i)(1)	Plant disease control: one of the few options for disease control
Copper sulfate	205.601(i)(2)	Plant disease control: one of the few options for disease control
Hydrated lime	205.601(i)(3)	Plant disease control: one of the few options for disease control
Hydrogen peroxide	205.601(i)(4)	Plant disease control: one of the few options for disease control
Lime sulfur	205.601(i)(5)	Plant disease control: one of the few options for disease control
Oils, horticultural	205.601(i)(6)	Plant disease control: one of the few options for disease control
Potassium bicarbonate	205.601(i)(8)	Plant disease control: one of the few options for disease control
Elemental sulfur	205.601(i)(9)	Plant disease control: one of the few options for disease control
Aquatic plant extracts	205.601(j)(1)	Soil Amendment
Elemental sulfur	205.601(j)(2)	Soil Amendment
Humic acids	205.601(j)(3)	Soil Amendment
Magnesium sulfate	205.601(j)(5)	Soil Amendment
Soluble boron products	205.601(j)(6)(i)	Soil Amendment
Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.	205.601(j)(6)(ii)	Soil Amendment
Liquid fish products	205.601(j)(7)	Plant or soil amendment

Sodium nitrate	205.602(g)	Naturally occurring mined mineral used as soil amendment
Chlorine Materials Calcium hypochlorite Sodium hypochlorite	205.605(b)	Water purification to comply with potable water rules & GAPs